

2013 AUG -5 PM 5: 53

CLERK'S OFFICE
U.S. DISTRICT COURT
SAN JUAN, P.R.

UNITED STATES OF AMERICA,

Plaintiff,

v.

COMMONWEALTH OF PUERTO RICO, and
the PUERTO RICO POLICE DEPARTMENT,

Defendants;

JORGE DIAZ CASTRO,

as Defendant – Intervenor.

XX

No. 3:12-cv-2039

(GAG)

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

1. I, Jorge Diaz Castro, proposed Intervening Defendant in the present case, move for leave to intervene as a matter of right under FRCP 24(a)(2) , or, alternatively, as a matter of permission at the discretion of the Court, pursuant to FRCP 24(b)(1) and (2); and to permit me to file an Answer. This motion is made on the grounds that: (1) (a) the motion is timely; (b) that I have significant, legally protectable interests that relate to this action; (c) that the disposition of this action has impaired my ability to protect such interests; and (d) that the present Defendants have failed to adequately represent my interests in this case; as a matter of right and/or upon permission; and (2) a statutory right to intervene, upon permission.

Continued...

**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO
NOTICE OF MOTION AND MOTION TO INTERVENE UNDER FRCP NO. 24**

No. 3:12-cv-2039

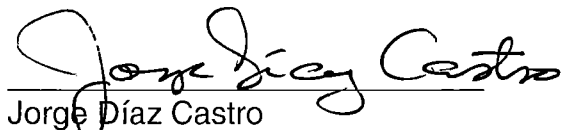
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2. This "Notice of Motion and Motion for Leave to Intervene" is based on the accompanying "Memorandum of Law" in support thereof.

WHEREFORE, proposed Intervening Defendant Jorge Díaz Castro respectfully requests that he be allowed to intervene in this case as a concerned lobbyist for Defendant Puerto Rico Police Department.

CERTIFICATION: I hereby certify that today I filed the foregoing with the Clerk of the Court which, on information and belief, shall automatically notify counsel of record which are CM/ECF system participants at the corresponding e-mail address, and which pursuant to Local Civil Rule 5, constitutes the equivalent service.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, on this 5th day of August, 2013.



Jorge Díaz Castro

PRO SE

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